

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

IRMA GLADYS PEREZ VEGA

CASE NO. 19-07141/MCF

DEBTOR

CHAPTER 13

BANCO POPULAR DE PUERTO RICO

MOVANT

INDEX

v.

IRMA GLADYS PEREZ VEGA
and Chapter 13 Trustee,
ALEJANDRO OLIVERAS RIVERA

RESPONDENTS

**DEBTOR'S RESPONSE TO MOTION FOR RELIEF OF THE
AUTOMATIC STAY, DOCKET NO. 39, AND MOTION FOR
EXTENSION OF TIME**

TO THE HONORABLE COURT:

NOW COMES, IRMA GLADYS PEREZ VEGA, Debtor through the undersigned attorney, and very respectfully states and prays as follows:

1. On November 15, 2021, Banco Popular of Puerto Rico ("Banco Popular") filed a *Motion for Relief from Stay*, Docket No. 39, basically alleging that Debtor is in arrears in her direct post-petition payments with said creditor, for three (3) direct mortgage loan payments in the total sum of \$2,423.73, including legal fees.

2. The Debtor hereby respectfully submits the present motion informing the Court that she is in the process of obtaining the funds to cure the arrears owed on the direct

Page -2-
Debtor's Response to §362 Motion
Case no. 19-07141/MCF13

post-petition arrears to Banco Popular.

3. The Debtor proposes that she will cure the arrears owed Banco Popular within thirty (30) days from December 14, 2021, the date of the scheduled preliminary hearing, in the above captioned index. This extension of time to expire on January 13, 2022.

WHEREFORE Debtor respectfully requests from this Honorable Court to grant the extension of time and Order the scheduling of a "final hearing", to allow the Debtor to cure the post-petition arrears owed to movant, in the above captioned Index.

I CERTIFY that on this same date a copy of this motion was filed with the Clerk of the Court using the CM/ECF filing system which will send notice of the same to: the Chapter 13 Trustee Alejandro Oliveras Rivera, Esq.; Kevin Miguel Rivera Medina Esq., *Colon Santana & Asociados, CSP*, Counsel for Movant Banco Popular de Puerto Rico; I also certify that a copy of this motion has been sent via US Postal Service to the Debtor/Respondent, Irma Gladys Perez Vega, to her address of record: Bo Celada Parcelas Nuevas 373, 30 Street, Gurabo PR 00778.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 24th day of November, 2021.

/s/Roberto Figueroa Carrasquillo

USDC #203614

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